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February 26, 2021

Via ECF

Magistrate Judge Ramon E. Reyes Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, NY 11201

Re: Kaikov v. Kaikov et al.
Docket # 1:19-cv-02521-JBW-RER
Joint Motion for Extension of Discovery Deadlines

Dear Judge Reyes,

This Firm represents defendants Kaikov, Pacific 2340 Corp., Royal A&K Realty Group Inc., A&E.R.E. Management Corp., NY Prime Holding LLC, AG Realty Bronx Corp, (“Defendants”) in the above referenced matter.

This is a second joint request for extension of deposition discovery deadlines.

On January 27, 2021, You issued an Minute Order extending time to complete depositions.

To date, the parties have completed depositions of Plaintiff, and Defendant respectively. Additionally, the parties completed the depositions of several non-parties.

Defendant completed depositions of Khanan and Ariel Kaikov – Plaintiff’s sons. Plaintiff began the deposition of Ralph Fayziev, but the deposition had to be adjourned because of Mr. Fayziev counsel’s emergency issue.

The deposition of non-party Ms. Ovcharenko, scheduled for February 25, 2021, had to be rescheduled due to her illness and technical issues with the internet in her residence.

Also, after deposition of the Plaintiff, Defendant determined that a deposition of Plaintiff’s brother and his wife is necessary, because in Defendant’s view, these witnesses have information relevant to the issue in the case. For example, Plaintiff’s brother controlled the corporation that made supposedly made a \$100,000 transfer towards the “joint investment.”

In addition, the Court has not ruled on Defendants' objection to the Court's order allowing documents production from Defendants' accountant. Plaintiff has served a subpoena to testify on the accountant as well and will need to take the deposition once there is a ruling regarding the production of documents. Similarly, Plaintiff expects to take deposition of Defendants' contractor once documents from the banks are received. *See* January 28, 2021 Minute Order (allowing Plaintiff to serve Rule 45 subpoenas).

Given counsel's prior obligations the parties estimate that they will need additional 60 days to complete discovery. Accordingly, the parties jointly request that the discovery and respective expert discovery deadlines are extended according to the following schedule:

Fact Discovery Deadline	April 30, 2021
Plaintiff's Expert Report	May 31, 2021
Defendant's Counter	June 30, 2021
Expert Depositions	July 30, 2021

We thank the Court for its courtesy.

Respectfully yours,

/s/ Kadochnikov

Alexander Kadochnikov

To: Via ECF
All counsel of record